

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
MITTAL STEEL NORTH AMERICA,

Plaintiff,

-against-

07 CV 10587 (DLC) (KNF)

ANSWER TO CROSS CLAIM
WITH AFFIRMATIVE
DEFENSES

M/V "FONTHIDA NAREE, her engines,
boilers, etc., WESTERN BULK SHIPPING
ASA, WESTERN BULK CARRIERS HOLDING ASA,
WESTERN BULK CARRIERS AS and PRECIOUS
CITIES LTD.,

Defendants.

-----X

Defendants WESTERN BULK SHIPPING ASA, WESTERN BULK
CARRIERS HOLDING ASA, and WESTERN BULK CARRIERS AS (answering
defendants), by their attorneys MAHONEY & KEANE, LLP, answer the
Cross-Claim of defendant PRECIOUS CITIES LTD. upon information and
belief as follows:

FIRST: Answering defendants deny knowledge or
information sufficient to form a belief as to the allegations
contained in paragraphs "20", "23" and "24" of defendant PRECIOUS
CITIES LTD.'s Cross-Claim.

SECOND: Answering defendants deny each and every
allegation contained in paragraphs "21" and "22" of defendant
PRECIOUS CITIES LTD.'S Cross-Claim.

AS AND FOR A FIRST SEPARATE AND COMPLETE AFFIRMATIVE DEFENSE

THIRD: Answering defendants repeat, reiterate and make applicable to defendant PRECIOUS CITIES LTD.'s Cross Claim each Separate and Complete Affirmative defense in their Answer to plaintiff's Complaint as if specifically set forth herein at length.

WHEREFORE, answering defendants demand judgment dismissing the Cross-Claim, and awarding to answering defendants costs, fees, including reasonable attorneys' fees and disbursements of this action, and further demand judgment for such other and further relief the Court may deem just and proper.

Dated: New York, N.Y.
February 11, 2008

MAHONEY & KEANE, LLP
Attorneys for Defendant

By: 

Garth S. Wolfson (GW 7700)
111 Broadway, Tenth Floor
New York, New York 10006
(212) 385-1422
File No.: 19/3521/B/08/1

TO: NICOLETTI HORNIGH & SWEENEY
Attorneys for Plaintiff
Wall Street Plaza
88 Pine Street
New York, NY 10005
(212) 220-3830

BLANK ROME LLP
Attorneys for Defendant
PRECIOUS CITIES, LTD.
405 Lexington Avenue
New York, NY 10174
(212) 885-5000